

Counsel for Plaintiff MacIntyre has not stated his position on this Motion, but Counsel for Ariel Grant opposes this Motion.

This case is set for trial on May 2, 2023. The proposed amended deadlines do not affect the jury trial date. Further, the requested extension conforms to the requirements of Local Rule 16.01(h)(1). No dispositive motion deadline is later than 90 days in advance of the trial date. Defendants request the following amendments to the Second Amended Case Management Order:

I. DISCLOSURE OF EXPERTS

Current: Plaintiff shall identify and disclose all expert witnesses and expert reports on or before July 18, 2022. Defendants shall identify and disclose all expert witnesses and reports on or before August 18, 2022. Expert depositions shall be completed by September 12, 2022.

Proposed Extension: The defendant shall identify and disclose all expert witnesses and reports on or before September 19, 2022. Expert depositions shall be completed by October 12, 2022.

J. DISPOSITIVE MOTIONS

Current: October 19, 2022.

Proposed Extension: November 18, 2022.

Defendants attach hereto as Exhibit A a Proposed Amended Case Management Order. Filed simultaneously with this Motion is Defendants' Memorandum of Law in Support of Motion. For reasons reflected therein, Defendants respectfully request that this Court grant their Motion to Modify Case Management Order.

Respectfully submitted,

/s/ Jamie A. Leaver

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August, 2022, a copy of the foregoing electronically filed document was served upon the parties listed below via U.S. Mail, postage prepaid, and/or electronic means as follows:

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By: /s/ Jamie A. Leaver

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